

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of RM-11306
Amendment of Part 97 of the Commission's
Rules To Implement the Basis for Bandwidth
Based Bandplanning

Via the ECFS
Comments on RM-11306

Dear Commissioners:

As a radio hobbyist for some thirty-two years (the latter sixteen of which I've held an Amateur Radio license), I would like to express my opposition to the American Radio Relay League's bandwidth segmentation proposal, RM-11306.

I am of the belief that the present mode-based subband allocations do well to separate the various transmission modes in the Amateur Radio Service. Without belaboring the various differences between them, I believe that it is advantageous to place similar modes together, in order to mitigate interference between incompatible modes.

History has shown that transmission modes that are technically and operationally incompatible with each other, when placed within the same subband, have proven at best annoying, and at worst operationally disastrous. At a time in American and world history when the accumulation and dissemination of information is vitally important in the event of an emergency, the smoothest possible operation of the Amateur Radio Service as an adjunct to the normal channels of communication must be encouraged.

It is generally felt within the American Amateur Radio community that the ARRL's proposal would lead to adversarial conditions on the Amateur bands, which would greatly increase the burden of enforcing 47CFR Part 97 regulations.

There have been other countries who have attempted to segment Amateur transmission modes by bandwidth, with at best, less-than-favorable and at worst, chaotic results. American Amateurs are fortunate to have been able to observe these developments.

It should be noted, rather obviously, that due to the inherent nature of high-frequency (HF) radio signals, political boundaries (state and national borders, et. al) can be and are routinely crossed by such signals. Any conflict or dissent that may arise as the result of mode incompatibility may very well not be limited to one specific area, country, or region. In fact, such conflict may cause friction between

operators in neighboring areas. In this, the role of Amateur Radio as “ambassador of international goodwill” would be compromised, in my humble opinion.

The current mode-based subband allocations provide structure and protection that the American Amateur Radio population, and indeed that of neighboring areas, has enjoyed for many years. The ARRL proposal, although perhaps well-meaning, could only serve to complicate efficient regulation of the amateur bands, and enforcement of such regulations.

In closing, I would implore the collective body of Commissioners, to reject the ARRL proposal and to keep intact the existing 47CFR Part 97 regulations pertaining to the separation of Amateur Radio operations by mode.

Respectfully submitted,

Michael D. Bolton, N5RLR